

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Jenieru k. Evans

Write the full name of each plaintiff.

\_\_\_\_ CV \_\_\_\_  
(Include case number if one has been assigned)

-against-

The City Of New York  
BRC Lex Safe Haven

**COMPLAINT**

Do you want a jury trial?  
☐ Yes ☒ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

**NOTICE**

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

## I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ Federal Question

☐ Diversity of Citizenship

### A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

4th Amendment

### B. If you checked Diversity of Citizenship

#### 1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, X, is a citizen of the State of  
(Plaintiff's name)

X  
(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

L  
If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, \_\_\_\_\_, is a citizen of the State of \_\_\_\_\_  
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of \_\_\_\_\_.

If the defendant is a corporation:

The defendant, BRC Lex Safe Haven, is incorporated under the laws of the State of New York

and has its principal place of business in the State of New York

or is incorporated under the laws of (foreign state) New York

and has its principal place of business in New York.

If more than one defendant is named in the complaint, attach additional pages providing information for each additional defendant.

## II. PARTIES

### A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional pages if needed.

<u>Jeniere</u>	<u>IC</u>	<u>Evans</u>
First Name	Middle Initial	Last Name
<u>690 E 182<sup>nd</sup> St APT. 3H</u>		
Street Address		
<u>Brooklyn, NY, 10457</u>		
County, City	State	Zip Code
<u>(718) 600-4338</u>	<u>evansjeniere3@gmail</u>	
Telephone Number	Email Address (if available)	

**B. Defendant Information**

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

The City Of New York

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 2:

BRC Lex Safe Haven

First Name

Last Name

566 West 182nd St

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

NY

NY

10033

County, City

State

Zip Code

Defendant 3:

~~Detective Leggio~~

First Name

Last Name

Current Job Title (or other identifying information)

~~137 Centre Street~~

Current Work Address (or other address where defendant may be served)

~~NY~~

~~NY~~

County, City

State

Zip Code

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

### III. STATEMENT OF CLAIM

Place(s) of occurrence:

Date(s) of occurrence:

#### FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

**INJURIES:**

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

**IV. RELIEF**

State briefly what money damages or other relief you want the court to order.

United States District Court Of The  
Southern District Of New York

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Jeniere K. Evans

-against-

The City Of New York

BRC Lex Safe Haven

Detective Leggio  
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Statement  
~~COMPLAINT~~

~~COMPLAINT~~

Comes now, through the action of the plaintiff, and files this complaint against defendants, for cause would show as follows:

1. Plaintiff is an adult resident of: 690 East 182<sup>nd</sup> street Apt. 3h  
Bronx, NY, 10457
2. Defendants will be served through the process of this court.
3. On, or about the day of **June 5<sup>th</sup>**, 2020, the defendants filed a claim with **Detective leggio**, claiming that the plaintiff forcibly touched, and sexually abused a resident, in the facility, where the plaintiff worked at the time, **BRC lex safe haven, 566 west 182<sup>nd</sup> Street Ny, NY, 10033**, as a result of the defendants actions, plaintiff was terminated from his job, arrested, imprisoned, and kicked out of the residency that the plaintiff had at the time, **Fairfield suites & Inn, on 95 Henry st. NY, Ny, 10002**. The information in the affidavits, and complaints were not true, as a result of abuse of process, lack of evidence, and speedy trial violations, the case was dismissed.
4. The actions of the Defendants were wrongful, malicious, and designed to embarrass, and damage plaintiff. Plaintiff suffered mental, and emotional anguish as a result of the defendants wrongful

5. Plaintiff has suffered harm to his reputation, humiliation, embarrassment, mental anguish, and distress by being arrested by the 68<sup>th</sup> precinct, on the false charges brought by the defendants.
6. Plaintiff will show that the actions of the defendants herein, reflect a malicious, intentional, willful, and reckless disregard of the plaintiffs rights, under the **§1983 Act**, and his **4<sup>th</sup> amendment** rights under the **U.S. Constitution** herein, and warrant an award of punitive damages to the plaintiff.



**SUING For:**

False Arrest  
False Imprisonment  
Malicious Prosecution  
Abuse Of Process  
Defamation Of Character  
Harassment  
Emotional Distress  
Loss Of Wages

**Amount Of Civilsuit:**

\$200,000

Sworn To Me Before This 21  
Day Of Oct 2021  
Andrew G. Varela

ANDREW G. VARELA  
Notary Public, State of New York  
Qualified in Kings County  
Reg. No. 24-4524268  
My Commission Expires Sept. 30, 2022

Jeniere Evans  
Print Name J. Evans  
Signature J. Evans jeniere3@gmail  
Email (718) 600-4338  
Phone Number

United States District Court of The  
Southern District of New York

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In The Matter Of The Claim Of

Jeniere K. Evans

-against-

The City Of New York

BRC Lex Safe Haven

Detective Leggio

~~Rina Chu~~

~~Jeff Greaux~~

~~Michelle Dantzer~~

~~Najee Robinson~~

~~Larry Harrison~~

J.E.

Notice Of Claim

PLEASE TAKE NOTICE that the claimant herein hereby makes claim and demands judgement against you as follows:

1. Pro Se Litigant:

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Name: Jeniere K. Evans

Gmal: evsjeniere3@gmail.com

Phone Number: (718) 600-4338

Address: 690 East 182nd street Apt. 3h  
Bronx, NY, 10457

2. **Nature Of Claim:** A false allegation was made by the defendants, which was dismissed, due to malicious prosecution, lack of evidence, and abuse of process, during the case, I was falsely arrested, imprisoned, and my character was defamed, under the § 1983 Act, as well as my constitutional rights, especially my 4<sup>th</sup> Amendment rights.
3. **Time Of Incident:** June 5<sup>th</sup>, 2020 at Approximately 7:40 p.m.

Dated: 10/21, 2021

Jeniere K. Evans

Print Name

Jeniere K. Evans

Signature

I Jeniere K. Evans, am the claimant in the above entitled-action, I have read the foregoing, and know the contents thereof. The contents are true to my own knowledge, except as to matters therein stated to be alleged upon information and belief, as to those matters I believe them to be true.

Sworn to before me on this 21

Day of October, 2021

Andrew G. Varela

Notary Public

ANDREW G. VARELA  
Notary Public, State of New York  
Qualified in Kings County  
Reg. No. 24-4524268  
My Commission Expires Sept. 30, 2022

**V. PLAINTIFF'S CERTIFICATION AND WARNINGS**

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

10/21/2021  
 Dated  
 Jeniere K. Evans  
 First Name Middle Initial Last Name  
 Plaintiff's Signature  
 690 East 182<sup>nd</sup> St Apt 3H  
 Street Address  
 Bx NY 10457  
 County, City State Zip Code  
 (718) 600-4338  
 Telephone Number  
 evansjeniere3@gmail  
 Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:  
☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.